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IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) CR-S-05-113-LKK
Plaintiff,) APPLICATION FOR RELEASE
v.) OF POST-INDICTMENT
SERGIO CURIEL, SR., and) RESTRAINING ORDER AND
CELINA CURIEL,) ORDER THEREON
Defendants.)

The United States makes application to this Court, to allow it to release the Restraining Order authorizing the freezing of bank accounts. As grounds therefor, the Government states as follows:

1. On March 18, 2005, pursuant to 21 U.S.C., § 853(e)(1)(A), this Court authorized a Post-Indictment Restraining Order on the following bank accounts:

All funds in the Bank of Stockton account number 21-07567-0-00, held in the name of Sergio Toscano Curiel, and

All funds in the Bank of Stockton account number 23-17177-4-00, held in the name of Celina Curiel.

27 2. On March 18, 2005, Federal Bureau of Investigation ("FBI")
28 Special Agent John Hayes served the Post-Indictment Restraining

1 Order on Rita Cordova, Assistant Vice President, at the Bank of
2 Stockton located at 301 E. Miner Street, Stockton, California, and
3 thereafter account number 21-07567-0-00 held in the name of Sergio
4 Toscano Curiel was frozen.

5 3. On March 18, 2005, FBI Special Agent Rodrigo Riveros
6 served the Post-Indictment Restraining Order on William C. Allen,
7 Assistant Vice President, at the Bank of Stockton located at 120 W.
8 Walnut Street, Lodi, California, and thereafter account number 23-
9 17177-4-00 held in the name of Celina Curiel was frozen.

10 4. Pursuant to the agreement with defendants Sergio Curiel,
11 Sr. and Celina Curiel, the United States respectfully requests that
12 the Court allow it to release the Bank of Stockton bank accounts
13 referenced above.

14 Dated: 6/22/07 Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

17 /s/ Mary L. Grad
18 MARY L. GRAD
Assistant U.S. Attorney

ORDER

21 The Court having considered the foregoing, and good cause
22 appearing therefrom, the Proposed Order for Release of the Post-
23 Indictment Restraining Order is hereby APPROVED.

24 It is so ORDERED.

25 || Dated: June 25, 2007

LAWRENCE K. KARLTON
LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT